

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re QUTOUTIAO, INC. SECURITIES
LITIGATION

1:20-cv-06707 (SHS)

This Document Relates To:

ALL ACTIONS.

**STIPULATION AND [PROPOSED] ORDER REGARDING TIME FOR DEFENDANT
LIGHTHOUSE CAPITAL INTERNATIONAL INC. TO RESPOND TO COMPLAINT**

WHEREAS, on January 15, 2021, Plaintiff James Pappas (“Plaintiff”) filed the Consolidated Amended Class Action Complaint for Violations of the Federal Securities Laws (ECF No. 41, the “Complaint”);

WHEREAS, on January 21, 2021, the Court issued a summons as to Lighthouse Capital International Inc. (“Lighthouse”), among other defendants (ECF No. 43, the “Summons”);

WHEREAS, on March 16, 2021, defendants Qutoutiao, Inc. and Oliver Yucheng Chen (together, the “Qutoutiao Defendants”) filed a motion to dismiss the Complaint (ECF No. 49, the “Qutoutiao Motion”);

WHEREAS, on March 16, 2021, defendants Citigroup Global Markets Inc., Deutsche Bank Securities, Inc., China Merchants Securities (HK) Co., Ltd., UBS Securities LLC, KeyBanc Capital Markets Inc., and Jefferies Group LLC (together, the “Underwriter Defendants”) filed a motion to dismiss the Complaint (ECF No. 53, the “Underwriters’ Motion” and, together with the Qutoutiao Motion, the “Outstanding Motions to Dismiss”);

WHEREAS, the Outstanding Motions to Dismiss were fully briefed as of July 1, 2021 (*see* ECF Nos. 62, 67);

WHEREAS, on December 1, 2021, Plaintiff filed a Motion for Leave for Alternative Service (the “Alternative Service Motion,” ECF No. 73);

WHEREAS, on December 14, 2021, the Court granted the Alternative Service Motion (the “Alternative Service Order,” ECF No. 79), then stayed the Alternative Service Order pending briefing on the Alternative Service Motion (ECF No. 81);

WHEREAS, the Alternative Service Motion was fully briefed as of January 19, 2022 (*see* ECF Nos. 84–86);

WHEREAS, on January 31, 2022, the Court entered an order vacating the stay of the Alternative Service Order (ECF No. 87);

WHEREAS, Lighthouse has not made a prior request to extend deadlines in this action,
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to
approval of the Court, that:

1. Lighthouse’s time to respond to the Complaint shall be extended until 30 days after the Court rules on the Outstanding Motions to Dismiss;
2. Lighthouse accepts service of the Complaint and Summons, but reserves and does not waive all other defenses, including without limitation those related to personal jurisdiction and extraterritorial application of the United States securities laws;
3. Following the Court’s decision on the Outstanding Motions to Dismiss, Plaintiff’s counsel and counsel for Lighthouse shall meet and confer on a proposed briefing schedule for any potential Lighthouse motion to dismiss; and
4. If the Court denies any or all of the Outstanding Motions to Dismiss, Lighthouse will not move to dismiss on the same basis as to which the Court denied dismissal, provided that Lighthouse retains the right to move to dismiss on other defenses including without limitation

those related to personal jurisdiction and extraterritorial application of the United States securities laws.

Dated: March 1, 2022

O'MELVENY & MYERS LLP

By: /s/ Jonathan Rosenberg

Jonathan Rosenberg
jrosenberg@omm.com
Amber L. Covucci
acovucci@omm.com
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

William K. Pao (*admitted pro hac vice*)
wpao@omm.com
400 South Hope Street
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

*Attorneys for Defendant Lighthouse Capital International Inc.
(Special limited appearance)*

Dated: March 1, 2022

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides

Constantine P. Economides
Ivy T. Ngo (*pro hac vice*)
Velvel (Devin) Freedman (*pro hac vice*)
200 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 971-5943
Email: ceconomides@rcfllp.com
Email: ingo@rcfllp.com
Email: vel@rcfllp.com

Eric Rosen
Kyle Roche
99 Park Avenue, 19th Floor
New York, NY 10016
Telephone: (646) 350-0527
Email: erosen@rcfllp.com
Email: kyle@rcfllp.com
*Counsel for Lead Plaintiff James Pappas
and Lead Counsel for the Class*

THE SCHALL LAW FIRM
Brian Schall (*pro hac forthcoming*)
1880 Century Park East, Suite 404
Los Angeles, CA 90067
Telephone: (424) 303-1964
Email: brian@schallfirm.com

*Additional Counsel for Lead Plaintiff
James Pappas*

SO ORDERED.

Dated: New York, New York
March __, 2022

Sidney H. Stein
United States District Judge